

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MALEEHA AHMAD, et al.,

Plaintiffs,

v.

CITY OF ST. LOUIS,

Defendant.

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Case No. 4:17-CV-2455-CAS

DECLARATION OF SERGEANT RANDY JEMERSON

I, Sergeant Randy Jemerson, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts.
2. I am a Sergeant with the City of St. Louis Police Division.
3. I am a supervisor of the Civil Disobedience Team.
4. On the evening of Friday, September 15, 2017, I was in the Central West End monitoring a large gathering of protestors.
5. At approximately 9:45 p.m., I heard on my radio that the protestors had begun to break the windows of a residence located at Lake and Waterman and owned by Mayor Lyda Krewson.
6. Shortly thereafter, I arrived at the corner of Lake and Waterman.
7. After arriving, I saw protestors throw red paint containing a chemical irritant at officers.
8. At approximately 10:07 p.m., Colonel Gerald Leyshock, the incident scene commander, authorized a declaration that the gathering at Waterman and Lake had become an unlawful assembly and that munitions were imminent.



9. I heard Sgt. Brian Rossomanno relay Col. Leyshock's dispersal order over a loudspeaker at the corner of Lake and Waterman.
10. I reasonably believed that the protestors in the vicinity could hear and understand the announcement.
11. When approached by protestor Marissa Southards and asked where she should disperse, I instructed her to go west on Waterman.
12. Throughout the course of the evening, I made dozens of dispersal announcements.
13. I witnessed criminal activity occur throughout the evening, including assaults on law enforcement officers.
14. I saw officers being struck by bricks.
15. I saw officers being struck by water bottles.
16. I saw windows broken by protestors.
17. I saw cars damaged by paint.
18. I saw protestors lighting objects on fire.
19. On the evening of Sunday, September 17, 2017, I was in downtown St. Louis monitoring multiple gatherings of protestors.
20. At approximately 10:40 p.m., a group of about 50 to 100 protesters gathered at the intersections of Tucker and Locust and Tucker and Washington standing on all corners and in the street in a manner that physically obstructed the reasonable movement of vehicular and pedestrian traffic in violation of Section 17.16275 of the St. Louis City Code.
21. At approximately 10:50 p.m., I heard Sgt. Rossomanno order the group of 50 to 100 protesters to disperse from the area.

22. I heard Sgt. Rossomanno notify the protestors that anyone who remained in the area would be subject to arrest and/or other actions up to and including the deployment of chemical munitions.
23. The announcement was made over a loudspeaker at the corner of Locust and Tucker.
24. I reasonably believed that the persons gathered at the intersection of Locust and Tucker and nearby could hear the announcement that was made.
25. Prior to Sgt. Rossomanno's announcement, I personally told multiple persons at the intersections of Locust and Tucker through Washington and Tucker and surrounding areas that it was time to leave.
26. After Sgt. Rossomanno's announcement, I again told multiple persons at the intersections of Locust and Tucker through Washington and Tucker and surrounding areas that it was time to leave.
27. Some persons left the area.
28. Many persons that did not leave the area responded to my orders to disperse with cursing and by stating that they would not leave.
29. All of the persons who did not leave were subsequently arrested.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 11th day of October, 2017.

By: _____

